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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

12/18/89

DWM-029

HAZARDOUS WASTE MANAGEMENT FACILITY INSPECTION REPORT

FACILITY INFORMATION

EPA

FACILITY NAME: ORBIS PRODUCTS COMPANY

FILE NUMBER: 07-14-132

VHT FACILITY FILE NUMBER:

PERMIT #:

REGION: M

INSPECTION DATE: 10/4/89, 10/10/89 & 9/27/89

INCIDENT/CASE NUMBER:

INSPECTION TYPE: 03

RESPONSIBLE AGENCY CODE: S

INSPECTOR'S NAME: THOMAS BRADY

INSPECTOR'S AGENCY: DIVISION

INSPECTOR'S BUREAU: BEFORM

EPA ID NUMBER: NJD 010910 099

ADDRESS: 55 VIRGINIA ST
NEWARK NJ 07114

LOT: 15 BLOCK: 37.73

COUNTY: ESSEX

FACILITY PERSONNEL: AL DEVIGILI - PLT. MGR.
WILLIAM AMMADUCCI
ROBERT AMMADUCCI

TELEPHONE #:

NOV 30 RECD

OTHER STATE/EPA PERSONNEL: DAVID ESTER

REPORT PREPARED BY: THOMAS BRADY

REVIEWED BY: M Sterling

DATE OF REVIEW: 12/18/89

REVISION: 3
01/88

253179

PHOTOS TAKEN: (__) YES (X) NO

SAMPLE TAKEN: (X) YES (__) NO

If yes, how many?

NO. OF SAMPLES: ~5 * NJDEP ID #: _____

MANIFESTS REVIEWED: (X) YES (__) NO

Number of Manifests in Compliance: 4

Number of Manifests Not in Compliance: —

List Manifest Document Numbers of Those Manifests Not in Compliance:

SAMPLING DONE BY BCTS PERSONNEL
ON 10/25/89

FOUR SHIPMENTS MADE IN LAST 3 YEARS

4/2/87 1250 GALLONS F005 TO WASTE CONVERSION INC

4/23/87 2400 GALLONS X722 TO PETROLEUM RECYCLING INC

4/22/88 5000 GAL. F003 TO MADUSA CEMENT, PA.

5/16/89 3300 GAL D002 TO MICHIGAN DISPOSAL INC, MI.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

Orbis Products Company is for the most part a closed chemical manufacturing plant. Most plant activities ceased in the mid 1980's. A small amount of custom mixing and blending of food additives is being done in two small vats in one building, ~~but the rest of the facility is inactive and mostly abandoned. Two people work at the plant as foreman and laborer.~~ Orbis has TSDF status: one storage tank and a drum storage pad, neither of ~~which~~ which is presently in use. ~~The tank has been emptied and dismantled and awaiting final closure approval from BHWC. The drum pad has been formally closed and deleted by BHWC.~~

The current blending operation in building 17 reportedly generates no waste, although over a thousand drums of materials left over from the company's past operations, as well as a lab fully ~~stocked~~ stocked with reagents and old samples, are presently stored throughout the site, mainly in buildings 1, 4, 5, and 17. Building #4, known as the quonset hut, also contains the only material currently identified as waste, 15 drums of para cresol tank bottoms and 29 drums of "waste solvent bottoms" from tank 19.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

Scrap metal, which the company owners have claimed to be [redacted] usable and/or saleable material, has [redacted] been inventoried and somewhat identified (see attached lists). Any unknowns are in the process of being sampled for identification. However, only a small portion is being identified as waste.

The 27 drums of waste observed had no accumulation start date on the labels.

Other violations noted during the company visit:

No written waste analysis plan

Inadequate inspection schedule

Inadequate inspection record - no time, note of observations

No documentation of annual training

Failure to keep training records

Failure to hold semi-annual drills

Inadequate assistance

No documentation of arrangements with local agencies

Failure to request semi-annual fire inspection

Inadequate contingency plan - no home addresses

Failure to submit plan to local officials

No land ban

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

On Oct 25, 89 the facility was sampled by personnel from BCTS. Several soil samples of possibly contaminated portion of the plant & well is from an excavated earth pile from underground tank removals, and [redacted] contents from a "product" drum were obtained for analysis.

		YES	NO	N/A
7:26-9.4(f)	General Inspection Requirements			
7:26-9.4(f)1	Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:			
7:26-9.4(f)1i	Discharge of hazardous waste constituents to the environment?	✓	—	—
7:26-9.4(f)1ii	A threat to human health?	✓	—	—
7:26-9.4(f)3	Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to environmental or human health?	✓	—	—
7:26-9.4(f)3i	Did the owner or operator submit the written inspection schedule to the department?	—	✓	—
	If yes, when was it submitted?	—	—	—
7:26-9.4(f)3iii	Is the written inspection schedule kept at the facility?	✓	—	—
7:26-9.4(f)3iv	Does the schedule identify the types of problems to be looked for during the inspection?	—	✓	—
7:26-9.4(f)3v	Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?	✓	—	—
7:26-9.4(f)5	Is there evidence that problems reported in the inspection log have not been remedied?	✓	—	—
7:26-9.4(f)6	Does the owner/operator record inspections in a log?	✓	—	—

		YES	NO	N/A
7:26-9.4(b)	Waste Analysis			
7:26-9.4(b)1i	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis most contain all the information necessary for proper treatment storage or disposal of the waste).	—	✓	—
7:26-9.4(b)1iii	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one:	✓	—	—
	Waste characteristics vary:	✓		
	All waste(s) are basically the same:	—		
	Company treats all waste(s) as hazardous:	—		
7:26-9.4(b)2	Is there a written waste analysis plan at the facility?	—	✓	—
	Does it contain:			
7:26-9.4(2)i	Parameters for which each hazardous waste stream will be analyzed including constituents listed in NJAC 7:26-8.16 and the rational for the selection of these parameters?			✓
7:26-9.4(b)2ii	The test methods which will be used to test for these parameters?	—	—	—
7:26-9.4(b)2iii	The sampling method which will be used to obtain a representative sample of the waste to be analyzed?	—	—	—
7:26-9.4(b)2iv	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?	—	—	—
7:26-9.4(b)2v	For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply?	—	—	—
7:26-9.4(b)2vii	Procedures which will be used to identify changes in waste stream characteristics?	—	—	—
	Does hazardous waste come to this facility from an outside source? (e.g., another generator).	—	✓	—
	If yes, list the name(s) of generators.			

YES NO N/A

7:26-9.9(i)3 Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period? ___ ___ ___

Does the owner/operator have a written estimate of the cost of post-closure for the facility? ___ ___ ___

If yes, what is it?

Please circle all appropriate activities and answer questions in appropriate sections all activities circled.

Storage	Treatment	Disposal
Container (circled)	Tank	Landfill
Tank, Above Ground	Surface Impoundments	
Tank, Below Ground	Incineration	Surface Impoundments
Surface Impoundments	Thermal Treatment	Other ________
Waste Piles		
Other ________	Chemical, Physical and Biological Treatment	
Other ________		

7:26-9.4(d) **Containers**

What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone). 55 gall. 15 [illegible] 19 [illegible]

7:26-9.4(d)1i Do the containers appear to be o sturdy leakproof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste? ✓ ___ ___

If no, explain.

		YES	NO	N/A
7:26-9.4(d)1i1	Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste?	✓		
	If no, explain.			
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	✓		
7:26-9.4(d)2	If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)3	Are hazardous wastes stored in containers made of compatible materials?	✓		
7:26-9.4(d)4i	Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?	✓		
	If no, explain.			
7:26-9.4(d)4iii	Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	✓		
	If no, explain.			
7:26-9.4(d)iv	Are containerized hazardous wastes segregated in storage by waste type?	✓		
7:26-9.4(d)v	Are containerized hazardous wastes arranged so that their identification label is visible?	✓		
7:26-9.4(d)5	Does the owner/operator inspect the container storage area at least daily, looking for leaks and for deterioration caused by corrosion or other factors?	✓		
7:26-9.4(d)6	Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓		

		YES	NO	N/A
7:26-9.4(d)7i	Are incompatible wastes, or incompatible wastes and materials placed in the same container?		✓	
	If yes, explain.			
7:26-9.4(d)7ii	Are hazardous wastes placed in unwashed containers that previously held incompatible wastes?		✓	
	If yes, explain.			
7:26-9.4(d)7iii	Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from the other materials or protected from them by means of a dike, berm, wall or other device?	✓		
7:26-9.4(e)1i	Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction?	✓		
	If no, explain.			
7:26-9.4(e)1ii	Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled?	✓		
	If no, explain.			
7:26-9.4(e)1iii	Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste?	✓		
	If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health.	✓		

		YES	NO	N/A
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?	✓		
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?	✓		
7:26-9.4(e)2v	Threaten human health or the environment?	✓		
7:26-11.2	**Tanks**			
	What are the approximate number and size of tanks containing hazardous waste?			✓
	Identify the waste treated/stored in each tank.			
	General Operating Requirements			
7:26-11.2(a)2	Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?			
	If yes, please explain.			
	Are there leaking tanks?			
7:26-11.2(a)2	Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures?			
7:26-11.2(3)	Do uncovered tanks have at least two feet of freeboard or an adequate containment structure?			
7:26-11.2(a)4	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?			
7:26-11.2(c)	**Inspections**			
	Is the tank(s) inspected for:			
	1. Discharge control equipment (each operating day).			

Inspector: THOMAS BRADY
Address:

Telephone No:

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

ORRIS PRODUCTS COMPANY — A. Handler Name
55 VIRGINIA ST — B. Street (or other identifier)
NEWARK — C. City
NJ — D. State
07114 — E. Zip Code
ESSEX — F. County Name
BLENDING & MIXING OF CHEMICAL FOOD ADDITIVES — G. Nature of Business; Identification of Operations: SIC Code(s)
NJD 010910099 — H. EPA ID #
WILLIAM & ROBERT AMMARUCCI — I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following vastes?

(i) ~~F001, F002, F004, or F005~~ ✓ Yes ___ No

(ii) F003 ✓ Yes ___ No

If an F003 vastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ✓ Yes ___ No

b. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Reports ✓ other (specify) ✓ MANIFESTS

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such vastes were not identified by the facility previously. If you are concerned that F-solvent vastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identfying potentially

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: _____

2. Dioxin wastes

a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ___Yes ✓No
(ii) F028 ___Yes ✓No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

a. Does the facility handle any of the following wastes?

(i) D002 ___Yes ✓No
(ii) D004 - D011 ___Yes ✓No

b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ___Yes ✓No

[California waste standards are presented as Appendix C]

c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ___Yes ✓No

d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ___Yes ✓No*

e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ___Yes ✓No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste? ✓Yes ___No

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?
___Yes ___No*

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: _____

_____

List those that did not exceed standards: _____

_____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] ___Yes* ___No

D. Management

1. Onsite management

a. Were restricted wastes managed onsite?
✓Yes ___No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?
✓Yes ___No

If yes, TSDF checklist must be completed.

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? ✓Yes ___No*

(ii) Corresponding treatment standard?
✓Yes ___No*

(iii) Manifest number? ✓Yes ___No*

(iv) Waste analysis, if available?
✓Yes ___No

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

(v) Did the generator submit the demonstration to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

(vi) If the Region 1 Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]?
___Yes ___No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ✓Yes ___No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]?
___Yes ✓No* NOT FOR MORE THAN 90 DAYS WASTE STORED

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___Yes ✓No

If yes, list type of treatment unit and processes

_____

_____

_____

If yes, TSDF checklist must be completed.

*/ A potential violation is indicated

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

DRAFT

RCRA LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

ORBIS PRODUCTS CO. — 55 VIRGINIA ST
A. Facility Name — B. Street (or other identifier)

NEWARK — NJ — 07114 — ESSEX
C. City — D. State — E. Zip Code — F. County Name

BLENDING & MIXING OF CHEMICAL FOOD ADDITIVES
G. Nature of business; identification of industrial and waste management operations; relevant SIC codes

NJD 010 710 099
H. EPA ID #

WILLIAM & ROBERT MARIA DUCCI
I. Facility Contact (Name and Phone Number)

II.A. For onsite facilities, complete the generator checklist — Comments

B. General Facility Standards

1. General

a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?
COMMERCIAL LAB

b. Describe the frequency of sampling conducted by the facility.
AS NEEDED FOR DISPOSAL

2. Treatment Facilities

a. Has the treatment facility revised its waste analysis plan [§268.7(b)] to meet the requirements of §264.13 or §265.13? ___Yes ___No* N/A

(i) Is the treatment facility conducting TCLP tests for wastes specified in Appendix A (i.e., those prohibited wastes subject to treatment standards expressed as waste extracts) per 286.7(b)(i)? ___Yes ___No*

* A potential violation is indicated

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

(ii) Is the treatment facility using the paint filter test for the California waste residues [§268.7(b)(ii)]? ___Yes ___No

(iii) Is the treatment facility testing the pH of California waste residues? ___Yes ___No

(iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [§268.7(b)(3)]? ___Yes ___No*

(v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [§268.7(b)(1)] ___Yes ___No*

3. Land Disposal Facilities

a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ___Yes ___No*

b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [§268.7(c)(2)]? ___Yes ___No*

c. Are they being tested in conformance with the frequency specified in the waste analysis plan [§268.7(c)(3)] ___Yes ___No*

d. Are the appropriate tests (TCLP vs. total waste) being used [§268.7(c)(2)]? ___Yes ___No*

C. Storage (§268.50)

1. a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ✓Yes ___No

If no, go to "c."

b. Are all containers clearly marked to identify content and date(s) entering storage [§268.50(a)(2)]? ___Yes ✓No*

* A potential violation is indicated

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [§264.73 or §265.73]?
___Yes ___No*

d. Do operating records agree with container labeling? [§268.50(a)(2) or §264.73 or §265.73]
___Yes ___No*

e. Is waste exceeding treatment standards stored for less than 1 year?
___Yes ___No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal?
___Yes ___No

If yes, state how: _____

f. Was/is waste exceeding treatment standards stored for more than one year?
___Yes ___No

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____
_____

D. Treatment in Surface Impoundments (§268.4)

1. Are prohibited wastes placed in surface impoundments for treatment?
___Yes ___No

If no, go to E.

2. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [§268.4(b) and §268.3]?
___Yes* ___No

3. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency [§268.4(a)(4)]?
___Yes ___No*

4. Have the minimum technology requirements been met [§268.4(a)(3)]?
___Yes ___No*

a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [§268.4(a)(3)(iii)]?
___Yes ___No*

* A potential violation is indicated

Handler Name: ORBIS PRODUCTS
ID Number: NJD 010910099
Inspector: [illegible]
Date: [illegible], 10/10, 87

Comments

APPENDIX A-1

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

	Yes	No
tetrachloroethylene	___	✓
trichloroethylene	___	✓
methylene chloride	___	✓
1,1,1-trichloroethane	___	✓
carbon tetrachloride	___	✓
chlorinated fluorocarbons	___	✓

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a resul· of being used in the process either in pure form or commercial grade?

	Yes	No
tetrachloroethylene	___	✓
trichloroethylenc	___	✓
methylene chloride	___	✓
1,1,1-trichloroethane	___	✓
chlorobenzene	___	✓
trichlorofluoromethane	___	✓
1,1,2-trichloro-1,2,2-trifluoroethane	___	✓
ortho-dichlorobenzene	___	✓
1,1,2-trichloroethane	___	✓

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated sovlents) as as result of being used in the process either inpure form or commercial grade?

	Yes	No
xylene	___	✓
acetone	___	✓
ethyl acetate	___	✓
ethyl ether	___	✓
methyl isobutyl ketone	✓	___
n-butyl alcohol	___	✓
cyclohexane	___	✓
methanol	✓	___

If the F003 vastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No N/A

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

4. Does the handler generate any of the folloving F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	/No
nitrobenzene	___Yes	/No

5. Does the handler generate any of the folloving F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	/Yes	___No
methyl ethyl ketone	___Yes	/No
carbon disulfide	___Yes	/No
isobutanol	/Yes	___No
pyridine	___Yes	/No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The folloving questions will be helpful in confirming this determination.

(a) Chemical carriers? /Yes ___No

If the ansver is yes, list the constituents.

_____

(b) Degreasing/cleaning? ___Yes /No

If the ansver is yes, list the constituents.

_____

(c) Diluents? ___Yes /No

If the ansver is yes, list the constituents.

_____

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

(d) Extractants? ___Yes /No

If the answer is yes, list the constituents.

_____

_____

(e) Fabric scouring? ___Yes /No

If the answer is yes, list the constituents.

_____

_____

(f) Reaction and synthesis media? /Yes ___No

If the answer is yes, list the constituents.

_____

_____

If questions 1-6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed. /Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1-6, answer this to determine whether it is a "solvent mixture" covered by the listings.

If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5% methylene chloride
2% trichloroethylene
25% 1,1,1-trichloroethane
68% mineral spirits
100%

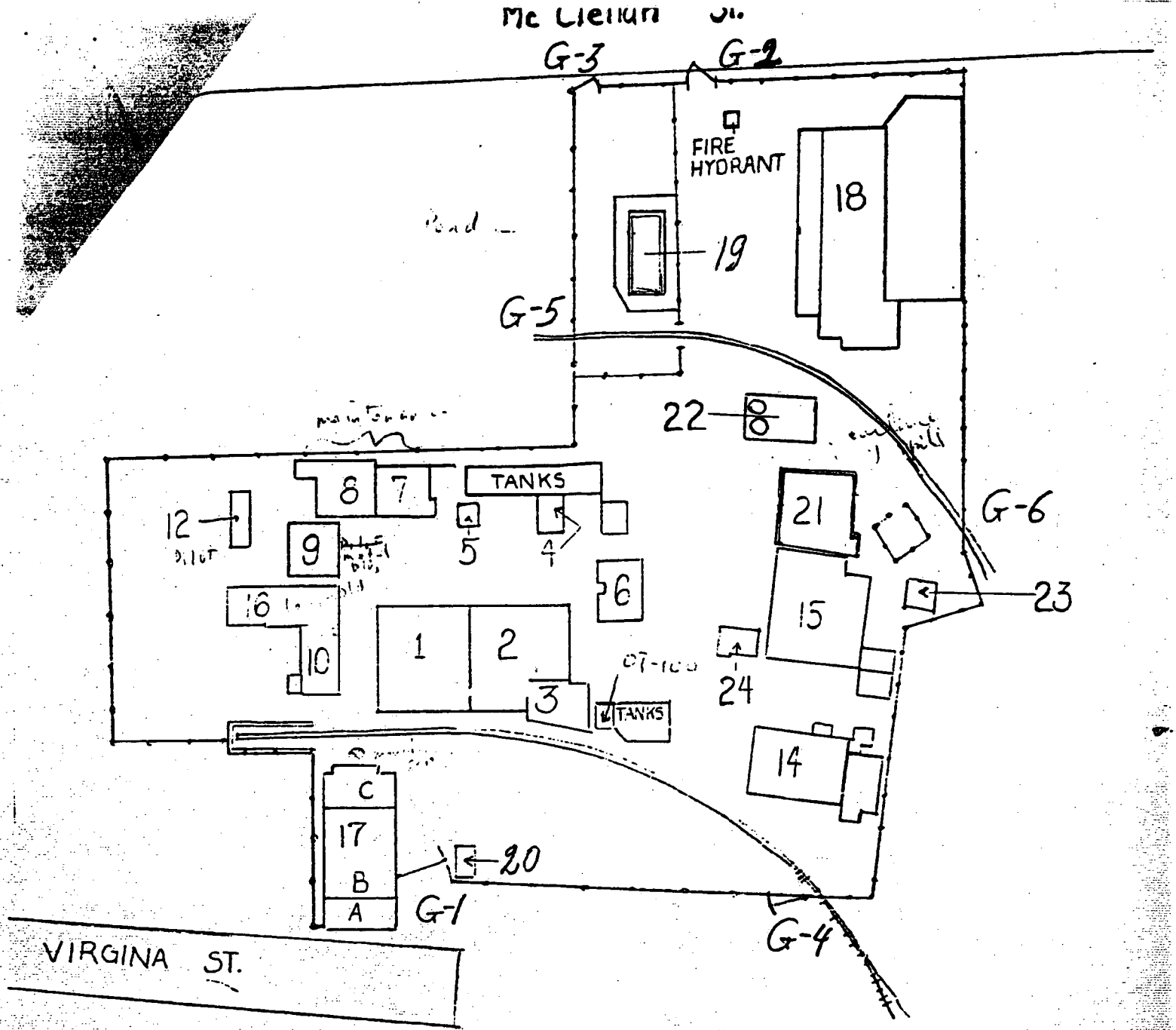
If the wastestream is a mixture containing a total of 10% or more by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

APPENDIX A-2. POTENTIAL F-SOLVENT WASTE MISCLASSIFICATIONS

F-SOLVENT WASTE CONSTITUENT*	CORRESPONDING 'P' CODES "acutely hazardous"	CORRESPONDING 'U' CODES** "toxic"
F001		
Tetrachloroethylene		U210
Trichloroethylene		U228
Methylene chloride		U080
1,1,1-trichloroethane		U226
Carbon tetrachloride		U211
Chlorinated fluorocarbons		
F002		
Tetrachloroethylene		U210
Methylene Chloride		U080
Trichloroethylene		U228
1,1,1-trichloroethane		U226
Chlorobenzene		U037
1,1,2-trichloro-1,2,2-trifluoroethane		
Ortho-dichlorobenzene		U070
Trichlorofluoromethane		
F003		
Xylene		U239 (I)
Acetone		U002 (I)
Ethyl acetate		U112 (I)
Ethyl benzene		
Ethyl ether		U117 (I)
Methyl isobutyl ketone		U161 (I)
n-butyl alcohol		U031 (I)
Cyclohexanone		U057 (I)
Methanol		U154 (I)
F004		
Cresols and cresylic acid		U052
Nitrobenzene		U169 (I)
F005		
Toluene		U220
Methyl ethyl ketone		U159 (I)
Carbon disulfide	P022	
Isobutanol		
Pyridine		U196

*Noninclusive of the following F-solvent constituents: benzene, 2-ethoxyethanol, 2-nitropropane, and 1,1,2 trichloroethane

**An 'I' indicates hazardous property of ignitability



ORBIS PRODUCTS CO.

SCALE 1" = 103'

FIG-1 LAYOUT OF ORBIS PLANT SITE

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3/87

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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
~~5th Fl., 401 E. State St., Trenton, N.J. 08625~~
2 Babcock Pl, W Orange NJ 07052

NOTICE OF VIOLATION (201) 669-3960

ID NO. NJD 010 910 099 DATE 10/4/89

NAME OF FACILITY ORBIS PRODUCTS COMPANY

LOCATION OF FACILITY 55 VIRGINIA ST NEWARK NJ 07114

NAME OF OPERATOR ROBERT & WILLIAM IANNUCCI

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION 7:26-9.4(b)2 No written waste analysis plan ; -9.4(f)3,iv Inadequate inspection schedule; -9.4(f)6 Inadequate inspection record ; ~~-9.4(g)6...~~ -9.4(g)6 No documentation of annual training ; -9.4(g)7 Failing to keep training records ; -9.4(g)8 Failing to hold semi-annual drills ; -9.6(e) Inadequate aisle space ; -9.6(f) No documentation of arrangements with

Remedial action to correct these violations must be initiated immediately and be completed by 10/25/89. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Thomas Brady
Investigator, Division of Waste Management
Department of Environmental Protection
Thomas Brady
10/10/89

Form HWM-004
3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
~~5th Fl., 401 E. State St., Trenton, N.J. 08625~~
2 BABCOCK PL, W ORANGE NJ 07052
(201) 669.3960

2/2

NOTICE OF VIOLATION

ID NO. NJD 010 910 099 DATE 10/4/89

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DESCRIPTION OF VIOLATION local agencies (police, fire, hospital, contractor);
-9.6(f)5 Failing to request semi annual fire inspection;
- 9.7(f) Incomplete listing in contingency plan (home addresses);
- 9.7(j) Failing to submit contingency plan to local authorities;
-9.8(c) No closure plan; -9.3(g)3 Failing to date
hazardous waste containers;

Remedial action to correct these violations must be initiated immediately and be completed by 10/25/89. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Thomas Brady
Investigator, Division of Waste Management
Department of Environmental Protection
Thomas Brady
10/10/89